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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**ORIGINAL
FILE**

In the Matter of) MM Docket No. 92-118
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations,)
(WRIGHTSVILLE, ARKANSAS))
)

TO: Chief, Allocations Branch
Mass Media Bureau

COMMENTS

Wrightsville Communications Company, Inc. (hereafter WCC), permittee of FM broadcast Station KYTN, Wrightsville, Arkansas, by its attorneys, and pursuant to Section 1.415 of the Rules (47 C.F.R. §1.415), hereby submits its comments concerning the proposed amendment to the FM Table of Allotments (47 C.F.R. §73.202(b)) to substitute Channel 299C2 for Channel 299A at Wrightsville. In support thereof, WCC respectfully states as follows:

1. In response to a Petition for Rule Making filed January 28, 1991, by WCC, the Commission, through its Allocations Branch, Mass Media Bureau, instituted rule making looking toward the substitution of Channel 299C2 for Channel 299A at Wrightsville, Arkansas. Notice of Proposed Rule Making (hereafter Notice), DA 92-629, released June 4, 1992. Interested parties were invited to file comments on or before July 27, 1992 (Ibid., ¶7).

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2. Consistent with ¶2 of the Appendix to the Notice, WCC hereby incorporates by reference its January 28, 1991, Petition for Rule Making. As reflected therein, WCC's proposed substitution of Channel 299C2 for Channel 299A at Wrightsville, using the coordinates of KYTN's currently authorized site, conforms with the minimum distance separation requirements of the Commission's rules.

3. As observed in the Notice (footnote 2), the license of Station KAKI, Benton, Arkansas, has been modified to specify operation on Channel 294C2 in lieu of Channel 296A. Amendment of Section 73.202(b) (Benton, Arkansas), 3 FCC Rcd 4840 (1988), recon. denied, 7 FCC Rcd 2555 (1992). Thus, insofar as WCC is aware, there is no impediment to the allotment of Channel 299C2 at Wrightsville and to the modification of KYTN's outstanding construction permit (or license) to specify operation thereon.^{1/}

4. The proposed modification of KYTN's CP also conforms with the requirements of Section 1.420(g)(3) of the Commission's Rules; that is, the modification would occur on a co-channel of a higher class.

5. Finally, WCC hereby restates its present intention to apply for Channel 299C2, if it is allotted to Wrightsville, and, if authorized, to promptly build the upgraded facilities.

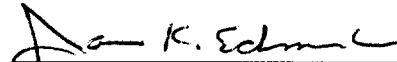
^{1/} WCC acknowledges that as reflected in the Notice (f/n 2), the Commission may withhold the issuance of a license for KYTN on Channel 299C2 until Station KAKI is authorized to operate on Channel 294C2.

WHEREFORE, for the foregoing reasons, WCC respectfully requests the Commission to substitute Channel 299C2 for Channel 299A at Wrightsville, Arkansas, and to modify KYTN's construction permit (or license) accordingly.

Respectfully submitted,

**WRIGHTSVILLE COMMUNICATIONS
COMPANY, INC.**

By:


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DATED: July 23, 1992
[34749]

CERTIFICATE OF SERVICE

I, Virginia L. Davidson, a secretary in the law offices of Gardner, Carton & Douglas, do hereby certify that true copies of the foregoing "COMMENTS" were sent July 23, 1992, by first-class United States mail, postage prepaid, or as indicated by hand to the following:

Michael C. Ruger, Chief
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
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(BY HAND)

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Virginia L. Davidson